

## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

FILED S. DISTRICT COURT RTHERN DIST. OF TX 2014 JUN 11 PM 3: 38 ch CLERK OF COURT

UNITED STATES OF AMERICA

v.

No. 4:14-CR-023-A

CHRISTOPHER ROBERT WEAST (01)

# GOVERNMENT'S NOTICE OF INTENT TO USE AUDIO AND VIDEO RECORDINGS

The United States, acting by and through the undersigned Assistant United States Attorney for the Northern District of Texas, files this Notice Of Intent to Introduce Audio and Video Recordings as possible evidence in the trial of this cause pursuant to the Court's Scheduling Order and would show the Court the following:

#### A. Video Recordings -

The government intends to use the following video recordings against the defendant at trial; for the recordings that also include audio, the government does not intend to introduce the audio communications:

### 1. Charged video depicting child pornography

The government intends to show the video file, !!!!Pthc Donna 9Yo Kinderkutje Pedo Babyj R@Ygold Rides Cock Mpeg.avi, depicting child pornography as charged in Count Two of the indictment. There is no audio.

### 2. Video - upshorts.mov

The government intends to show a video recorded by Weast in which he uses a recording device to focus primarily on the lower torso and genital area of a minor female who is wearing shorts. Weast also appears in the video. There is audio to the recording; however, the government does not intend to play the audio.

# 3. Video – laying out.mov

The government intends to show a video recorded by Weast in which he uses a recording device to focus on the lower torso and genital area of a minor female who is wearing shorts. Weast also appears in the video. There is audio to the recording; however, the government does not intend to play the audio.

#### 4. Video – Img 3925

The government intends to show a video recorded by Weast in which he uses a recording device to capture a minor who is nude from the waist up. There is no audio to the recording.

#### В. Audio Recordings -

The government may introduce the following audio recordings against the defendant in trial:

#### 1. Audio recording of the interview of defendant

The audio recording, which lasts approximately five minutes, contains an interview of defendant Weast conducted by R.D. Watkins on July 10, 2012.

### 2. Audio recording of Weast

This audio recording involves Weast contacting by phone FWPD Internal Affairs to make a complaint. The recording lasts approximately 6 minutes and 20 seconds.

### 3. Audio recording of Weast

This audio recording is a second call from Weast to Sgt Benjamin with FWPD Internal Affairs. The recording is approximately 12 minutes and 21 seconds, however the conversation lasts approximately 6 minutes and 53 seconds.

Respectfully submitted,

SARAH R. SALDAÑA UNITED STATES ATTORNEY

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# **CERTIFICATE OF SERVICE**

I hereby certify that on June 11, 2014, the foregoing Government's Notice was served via overnight mail to Christopher Weast, Register No. 47797-177, c/o case manager K. Goldsby, Federal Correction Institute, 3150 Horton Road, Fort Worth, Texas 76119.

AISHA SALEEM

**Assistant United States Attorney**